

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JUSTIN M. BRAUN : CIVIL ACTION
v. :
SQUARE D COMPANY and : NO. 02-4001
ENGEL INDUSTRIES, INC. : JURY TRIAL DEMANDED

ORDER

AND NOW, this _____ day of _____, 2003, upon consideration of the parties' Joint Motion to Extend Deadlines, it is hereby ORDERED as follows:

1. Discovery will be completed by July 31, 2003.
2. Plaintiff shall comply with the requirements of Fed.R.Civ.P. 26(a)(2) for disclosure of liability expert testimony by May 15, 2003 and damages expert testimony by June 15, 2003.
3. The defendants shall comply with the requirements of Fed.R.Civ.P. 26(a)(2) for disclosure of liability expert testimony by July 1, 2003 and damages expert testimony by July 31, 2003.
4. All motions for summary judgment or partial summary judgment shall be filed and served on or before August 15, 2003
5. The case will be ready for trial on or after September 30, 2003.

J.

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JOINT MOTION TO EXTEND DEADLINES

All parties to this case hereby jointly request that this Court extend all of the deadlines applicable to this matter and, in support thereof, assert the following:

1. Plaintiff Justin Braun suffered the amputation of portions of four fingers on his right dominant hand as a result of an accident that occurred while he was operating a press brake, a piece of machinery used to bend and form metal. Plaintiff has asserted claims of strict liability and negligence against Square D Company and Engel Industries, Inc.

2. Due to various problems involving snow storms, medical problems involving client representatives and other conflicts, an inspection of the product by defendant Engel Industries did not take place until recently and the scheduling of depositions has been delayed. Also, in regard to damages, there have been delays occasioned by plaintiff's interaction with the Office of Vocational Rehabilitation. The parties jointly request that this Court extend the discovery deadline to July 31, so the parties can investigate this case and exchange expert reports.

3. The defendants believe that they will not be in a position to analyze plaintiff's claims until plaintiff has produced reports from his liability expert(s) identifying his theories of liability. Therefore, the parties have mutually agreed upon a schedule that will allow for the exchange of expert disclosures while discovery proceeds.

4. Recently, the Court issued an Order scheduling this matter for trial on July 21, 2003. The extension requested by the parties will only delay trial for approximately two months.

WHEREFORE, the parties jointly request that this Court grant their Motion and extend all deadlines in accordance with the proposed Order that was jointly prepared.

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CERTIFICATE OF SERVICE

I, Michael P. Zipfel do hereby certify that a copy of the foregoing Joint Motion to Extend Deadlines was sent via regular first class mail on March 6, 2003 to the following:

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